

# EXHIBIT 4

**Inflation Adjustments to the Civil Monetary Penalties  
Administered by the Securities and Exchange Commission (as of January 15, 2024)**

U.S. Code citation	Civil monetary penalty description	Date of Violation and Corresponding Penalty					
		Dec. 10, 1996— Feb. 2, 2001 <sup>i</sup>	Feb. 3, 2001— Feb 14, 2005 <sup>ii</sup>	Feb. 15, 2005— Mar. 3, 2009 <sup>iii</sup>	Mar. 4, 2009— Mar. 5, 2013 <sup>iv</sup>	Mar. 6, 2013— Nov. 2, 2015 <sup>v</sup>	Nov. 3, 2015— Present <sup>vi</sup>
15 U.S.C. 77h-1(g) (Securities Act Sec. 8A(g))	For natural person	N/A	N/A	N/A	\$7,500 <sup>vii</sup>	\$7,500	\$10,550
	For any other person	N/A	N/A	N/A	75,000 <sup>vii</sup>	80,000	105,505
	For natural person / fraud	N/A	N/A	N/A	75,000 <sup>vii</sup>	80,000	105,505
	For any other person / fraud	N/A	N/A	N/A	375,000 <sup>vii</sup>	400,000	527,522
	For natural person / fraud / substantial losses or risk of losses to others or gains to self	N/A	N/A	N/A	150,000 <sup>vii</sup>	160,000	211,009
	For any other person / fraud / substantial losses or risk of losses to others or gain to self	N/A	N/A	N/A	725,000 <sup>vii</sup>	775,000	1,019,877
15 U.S.C. 77t(d) (Securities Act Sec. 20(d))	For natural person	\$5,500	\$6,500	\$6,500	7,500	7,500	11,524
	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others	550,000	600,000	650,000	725,000	775,000	1,152,314

15 U.S.C. 78u(d)(3) (Exchange Act Sec. 21(d)(3))	For natural person	5,500	6,500	6,500	7,500	7,500	11,524
	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others or gains to self	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others or gain to self	550,000	600,000	650,000	725,000	775,000	1,152,314
	Insider Trading – controlling person	1,100,000	1,200,000	1,275,000	1,425,000	1,525,000	2,559,636
15 U.S.C. 78u-2 (Exchange Act Sec. 21B)	For natural person	5,500	6,500	6,500	7,500	7,500	11,524
	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others	550,000	600,000	650,000	725,000	775,000	1,152,314
	Exchange Act / failure to file information documents, reports	110	110	110	110	210	680
15 U.S.C. 78ff(c)(1)(B) (Exchange Act Sec. 32(c)(1)(B))	Foreign Corrupt Practices – any issuer	11,000	11,000	11,000	16,000	16,000	25,597
15 U.S.C. 78ff(c)(2)(B) (Exchange Act Sec. 32(c)(2)(B))	Foreign Corrupt Practices – any agent or stockholder acting on behalf of issuer	11,000	11,000	11,000	16,000	16,000	25,597

15 U.S.C. 80a-9(d) (Investment Company Act Sec. 9(d))	For natural person	5,500	6,500	6,500	7,500	7,500	11,524
	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others or gains to self	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others or gain to self	550,000	600,000	650,000	725,000	775,000	1,152,314
15 U.S.C. 80a-41(e) (Investment Company Act Sec. 42(e))	For natural person	5,500	6,500	6,500	7,500	7,500	11,524
	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others	550,000	600,000	650,000	725,000	775,000	1,152,314
15 U.S.C. 80b-3(i) (Investment Advisers Act Sec. 203(i))	For natural person	5,500	6,500	6,500	7,500	7,500	11,524
	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others or gains to self	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others or gain to self	550,000	600,000	650,000	725,000	775,000	1,152,314

15 U.S.C. 80b-9(e) (Investment Advisers Act Sec. 209(e))	For any other person	55,000	60,000	65,000	75,000	80,000	115,231
	For natural person / fraud	55,000	60,000	65,000	75,000	80,000	115,231
	For any other person / fraud	275,000	300,000	325,000	375,000	400,000	576,158
	For natural person / fraud / substantial losses or risk of losses to others	110,000	120,000	130,000	150,000	160,000	230,464
	For any other person / fraud / substantial losses or risk of losses to others	550,000	600,000	650,000	725,000	775,000	1,152,314
	For natural person	N/A	100,000 <sup>viii</sup>	110,000	120,000	130,000	169,700
15 U.S.C. 7215(c)(4)(D)(i) (Sarbanes-Oxley Act Sec. 105(c)(4)(D)(i))	For any other person	N/A	2,000,000 <sup>viii</sup>	2,100,000	2,375,000	2,525,000	3,394,024
15 U.S.C. 7215(c)(4)(D)(ii) (Sarbanes-Oxley Act Sec. 105(c)(4)(D)(ii))	For natural person	N/A	750,000 <sup>viii</sup>	800,000	900,000	950,000	1,272,758
	For any other person	N/A	15,000,000 <sup>viii</sup>	15,825,000	17,800,000	18,925,000	25,455,170

<sup>i</sup> Release Nos. 33-7361, 34-37912, IA-1596, IC-22310, dated November 1, 1996 (effective Dec. 9, 1996), previously found at 17 CFR 201.1001 and Table I to Subpart E of Part 201.

<sup>ii</sup> Release Nos. 33-7946, 34-43897, IA-1921, IC-24846, dated January 31, 2001 (effective Feb. 2, 2001), previously found at 17 CFR 201.1002 and Table II to Subpart E of Part 201.

<sup>iii</sup> Release Nos. 33-8530, 34-51136, IA-2348, IC-26748, dated February 9, 2005 (effective Feb. 14, 2005), previously found at 17 CFR 201.1003 and Table III to Subpart E of Part 201.

<sup>iv</sup> Release Nos. 33-9009, 34-59449, IA-2845, IC-28635, dated February 25, 2009 (effective Mar. 3, 2009), previously found at 17 CFR 201.1004 and Table IV to Subpart E of Part 201.

<sup>v</sup> Release Nos. 33-9387, 34-68994, IA-3557, IC-30408, dated February 27, 2013 (effective Mar. 5, 2013), previously found at 17 CFR 201.1005 and Table V to Subpart E of Part 201.

<sup>vi</sup> Release Nos. 33-11263; 34-99276; IA-6521; IC-35085, dated January 5, 2024 (effective Jan. 15, 2024). The adjusted penalty amounts in this release apply to all penalties imposed after January 15, 2024, for violations that occurred after November 2, 2015.

<sup>vii</sup> Effective from July 21, 2010 (enactment of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. 111-203), through March 5, 2013.

<sup>viii</sup> Effective from July 30, 2002 (enactment of the Sarbanes-Oxley Act of 2002, Pub. L. 107-204), through February 14, 2005.